

WILMERHALE

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**BY ECF**

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The Honorable J. Paul Oetken  
United States District Court  
for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Emile v. Ethical Culture Fieldston School*, 21-CV-03799 (JPO)

Dear Judge Oetken:

On behalf of Defendants, I write to respond briefly to the letter on April 15, 2024 by Plaintiffs' former counsel concerning Defendants' request for a brief extension of time (until May 15, 2024) to pay Plaintiffs and The Cochran Firm the agreed-upon settlement amount. ECF No. 177.

Any payment obligation should be triggered only after the Court's decision of March 21, 2023 becomes final. Defendants stand ready to make payment, and will promptly do so once the Court's decision is final. For this reason, Defendants requested only a brief extension of two weeks, which will give greater certainty to everyone involved that the matter is closed. Plaintiffs' former counsel will not be prejudiced by that brief extension.

For this reason (and as discussed at the April 12, 2024 status conference), Defendants request that the Court extend their deadline to remit all necessary payments under the settlement to May 15, 2024.

Respectfully submitted,

/s/ Alan E. Schoenfeld  
Alan E. Schoenfeld

cc: All Counsel of Record (via ECF)